



December 13, 2005

Honorable Kevin J. Martin, Esq.
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Ex Parte Submission Regarding the
Dedicated Short Range Communications Service
WT Docket 01-90

Chairman
J. Morton, Jr.
Nissan

President
T. MacCarthy

Dear Chairman Martin:

MEMBERS

Aston Martin
Ferrari/Maserati
Honda
Hyundai
Isuzu
Kia
Mitsubishi
Nissan
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Toyota

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Bosch
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Peugeot
Renault

The Technical Affairs Committee of the Association of International Automobile Manufacturers, Inc. (AIAM)¹ provides the following comments in support of petitions for reconsideration filed in this docket requesting that the Commission designate Channel 172 in the Dedicated Short Range Communications Service ("DSRC") as a high availability, low latency channel for the highest priority vehicle safety communications.

In previous comments filed with the Commission, AIAM expressed support for the allocation of the 5.9 GHz Band for DSRC systems operating in the ITS Radio Service and the recommendation of ITS America that public safety and private users share the band, with public safety activities having priority over private transmissions.² Subsequent to the issuance of the Commission's Report and Order, FCC 03-324, petitions for reconsideration were filed by ARINC and ITS America that included requests for the Commission to designate Channel 172 for high availability, low latency safety communications due to concerns that the capability of the Control Channel to support these critical safety communications would be inadequate.³ AIAM shares these concerns.

¹ AIAM Technical Affairs Committee members are American Honda Motor Co., American Suzuki Motor Corp., Aston Martin Lagonda of North America, Inc., Delphi Corporation, Denso International America, Inc., Ferrari North America, Inc., Hitachi Automotive Products (USA), Hyundai Motor America, Isuzu Motors America, Inc., Kia Motors America, Maserati North America, Inc., Nissan North America, Inc. Peugeot Motors of America, Renault, SA, Robert Bosch Corporation, Subaru of America, and Yazaki North America, Inc.

² Reply Comments filed by the AIAM Technical Affairs Committee on April 15, 2003 regarding the Commission's notice of proposed rulemaking regarding licensing and service rules for the 5.850-5.925 GHz Band (5.9 GHz Band) for Dedicated Short-Range Communications (DSRC) in the Intelligent Transportation Systems (ITS) Radio Service (WT Docket No. 01-90/ET Docket No. 98-95).

³ See Petitions for Reconsideration filed September 2, 2004 by ARINC and ITS America (WT Docket No. 01-90).



Communications between vehicles for collision mitigation applications will typically take place during the last 500 milliseconds prior to impact. Without usage restrictions that prohibit low priority, non-safety-related communications from being delivered over Channel 172, AIAM is concerned that vehicle collision mitigation applications will not be able to reliably use Channel 172 for the critical, latency-intolerant vehicle-to-vehicle communications necessary for the collision mitigation systems in the involved vehicles to perform to their full potential.

The Commission's DSRC Report and Order is an important step in promoting the development of innovative DSRC services for improving safety and mobility for motorists in the United States. To realize the potential safety benefits of DSRC applications for collision mitigation, AIAM recommends that the Commission designate Channel 172 of the DSRC for high availability, low latency vehicle safety communications.

AIAM appreciates the Commission's consideration of our comments. Should you have any questions on this matter, please contact me at (703) 247-2105.

Respectfully Submitted,



Michael X. Cammisa

Director, Safety

Association of International Automobile
Manufacturers, Inc.

